

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
(Eastern Division)**

COMMONWEALTH CARE)	
ALLIANCE, HEALTH CARE FOR)	
ALL, GLENN CRENSHAW, AND)	
PAULA CRENSHAW, individually)	
and on behalf of persons similarly)	
situated,)	
)	
Plaintiffs)	No. 05 CV 10-335-DPW
)	
v.)	
)	
ASTRAZENECA)	
PHARMACEUTICALS L.P.,)	
ASTRAZENECA PLC,)	
ASTRAZENECA US, ZENECA, INC.,)	
AND ZENECA HOLDINGS, INC.,)	
)	
Defendants.)	
)	

**DEFENDANTS' CERTIFICATION
PURSUANT TO LOCAL RULE 16.1(D)(3)**

Pursuant to Local Rule of Civil Procedure 16.1(d)(3), Defendants AstraZeneca

Pharmaceuticals LP, Zeneca, Inc., and Zeneca Holdings, Inc. ("Defendants") (AstraZeneca US is not a legal or operating entity and, therefore, is not able to make a certification pursuant to Local Rule 16.1)¹ and Defendants' counsel hereby certify that they have conferred (1) with a view towards establishing a budget for the costs of conducting the full course - and various

¹ Defendant AstraZeneca PLC intends to file a motion to dismiss that corporation from this action on the grounds that personal jurisdiction over AstraZeneca PLC is lacking. AstraZeneca, PLC is a corporation formed under the laws of the United Kingdom and has no operations in the Commonwealth of Massachusetts.

alternative courses - of the litigation; and (2) to consider the resolution of the litigation through the use of alternative resolution programs, such as those outlined in LR 16.4.

/s/ Peter L. Welsh

Harvey J. Wolkoff (BBO #532880)

Joshua S. Levy (BBO #563017)

Peter L. Welsh (BBO #643261)

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AstraZeneca PLC, Zeneca, Inc., and Zeneca
Holdings, Inc.*

*Authorized Representative for AstraZeneca Pharmaceuticals LP,
Zeneca, Inc., and Zeneca Holdings, Inc.*

Marie L. Martino

Marie L. Martino

Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was served electronically pursuant to Fed. R. Civ. P. 5(b)(2)(D) or mailed pursuant to Fed. R. Civ. P. 5(b)(2)(B), by First Class Mail, postage prepaid, this 31st of March, 2005, to the counsel of record for each party.

/s/ Peter L. Welsh

Peter L. Welsh (BBO #643261)

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Dated: March 31, 2005